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Attorneys for Plaintiff
KATHLEEN NOBLES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KATHLEEN NOBLES, an individual,) Case No. 5:19-cv-07362-BLF
Plaintiff,)
vs.)
FRED M. KERN and PLUM HOLDINGS LLC, a)
Nevada Limited Liability Company,)
Defendants.)
FRED M. KERN,)
Counter and Crossclaimant,)
vs.)
KATHLEEN NOBLES and BRENTON A. HERING,)
Counter and Crossdefendants.)
NOTICE OF PENDENCY OF ACTION
(LIS PENDENS)

1 Attached hereto is a copy of the Notice of Pendency of Action (*Lis Pendens*) recorded with
2 the Monterey County recorder.

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5 Dated: February 13, 2020

FARRIMOND LAW OFFICES,
6 a Professional Corporation

7
8 /s/Randall S. Farrimond _____
9 RANDALL S. FARRIMOND
10 Attorneys for Plaintiff
11 KATHLEEN NOBLES

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Recording requested by:

Randall S. Farrimond, Esq.

WHEN RECORDED MAIL TO:

Randall S. Farrimond, Esq.

Farrimond Law Offices APC

88 Kearny Street, Suite 1850

San Francisco, CA 94108

2020005135

Stephen L. Vagnini

Monterey County Clerk-Recorder

01/31/2020 10:36 AM

Recorded at the request of:
RANDALL S FARRIMOND ESQ

Titles: 1 Pages: 5

Fees: \$100.00

Taxes: \$0.00

AMT PAID: \$100.00



THIS SPACE FOR RECORDER'S USE ONLY

TITLE OF DOCUMENT

NOTICE OF PENDENCY OF ACTION (LIS PENDENS)

1 RANDALL S. FARRIMOND
2 (CSB No. 095281)
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4 a Professional Corporation
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10 Attorneys for Plaintiff
11 KATHLEEN NOBLES

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN NOBLES, an individual,) Case No. 5:19-cv-07362-BLF
Plaintiff,)
vs.)
FRED M. KERN and PLUM HOLDINGS LLC, a)
Nevada Limited Liability Company,)
Defendants)
)

NOTICE IS HEREBY GIVEN that the above-entitled action concerning and affecting real property as described herein was commenced on November 11, 2019, by plaintiff Kathleen Nobles, against defendants Fred M. Kern and Plum Holdings LLC and is now pending before the Honorable Beth Labson Freeman in Courtroom 3, 5th Floor of the San Jose Division of the United States

1 District Court for the Northern District of California, located at the Robert F. Peckham Federal
2 Building & United States Courthouse, 280 South 1st Street, San Jose, CA 95113, California.

3 The action affects title to or right to possess the real property at 2 NE of 3rd Ave. Monte
4 Verde Street, Carmel-by-the-Sea, California, legally described in Exhibit A attached to this Notice.

5 The parties to said action are set forth in the title to the action.

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8 Dated: January 30, 2020

FARRIMOND LAW OFFICES,
a Professional Corporation

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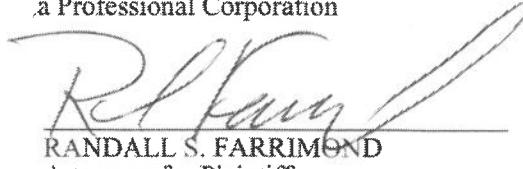
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RANDALL S. FARRIMOND
Attorneys for Plaintiff
KATHLEEN NOBLES

SWORN TO ME THIS 30th DAY
OF January, 2020.
2020

My Commission Expires April 5, 2026

EXHIBIT "A"
Legal Description

For APN/Parcel ID(s): 010-221-012

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF CARMEL BY THE SEA, COUNTY OF MONTEREY, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

Lot 14 and the South 35 feet of Lot 12, in Block 31, as shown on that certain Map entitled, "Addition No. 4 to Carmel-by-the-Sea", filed March 6, 1908 in Book 1, Maps of "Cities and Towns", at Page 46 1/2, in the Office of the County Recorder of Monterey County, California.

PROOF OF SERVICE

1 I, Irene M. Hardy declare:

2
3 I am employed in the City and County of San Francisco; I am over the age
4 of 18 years and not a party to the within action; my business address is 88 Kearny Street,
5 Suite 1850, San Francisco, California 94108. I declare that I am either a member of the
6 bar, or that I am employed in the office of a member of the bar of this Court at whose
7 direction the service was made.

8 On January 30, 2020, I caused to be served the following documents:

9 **NOTICE OF PENDENCY OF ACTION (LIS PENDENS)**

10 **CERTIFIED MAIL, RETURN RECEIPT REQUESTED:** by placing
11 true copies thereof in sealed envelopes in the United States mail, with
12 postage fully prepaid, certified mail, return receipt requested, and addressed
13 as shown below.

14 **PERSONAL SERVICE:** by personally serving by hand-delivery the same
15 in an envelope(s) addressed as shown below.

16 **OVERNIGHT DELIVERY:** by enclosing a true copy(ies) in a sealed
17 Federal Express envelope(s), fully prepaid, addressed as shown below.

18 **BY FACSIMILE:** by transmitting by facsimile to the number(s) shown
19 below.

20 **BY E-MAIL:** by transmitting by e-mail to the address(es) shown below.

21 Said document(s) was/were served by the method(s) indicated on:

22 Plum Holdings, LLC
23 PO BOX 5337-8211
24 Carmel, CA 93921

25 Plum Holdings, LLC
26 c/o CT Corporation System
27 818 West Seventh Street, Suite 930
28 Los Angeles, CA 90017

29 Fred M. Kern
30 PO BOX 5337-8211
31 Carmel, CA 93921

32 Ralph P. Guenther, Esq.
33 Guenther Law Group PLC
34 601 S. Main Street
35 Salinas, CA 93901

36 I declare under penalty of perjury under the laws of the State of California
37 that the foregoing is true and correct and that this declaration was executed on January
38 30, 2020, at Columbia, South Carolina.

39 
40 Irene M. Hardy